

NELSON & HOUMAND, P.C.
3900 Paradise Road, Suite U, Las Vegas, Nevada 89169
Telephone: (702) 720-3370 Facsimile: (702) 720-3371

Victoria L. Nelson, Esq. (NV Bar No. 5436)
Email: vnelson@nelsonhoumand.com
Jacob L. Houmand, Esq. (NV Bar No. 12781)
Email: jhoumand@nelsonhoumand.com
NELSON & HOUMAND, P.C.
3900 Paradise Road, Suite U
Las Vegas, Nevada 89169-0903
Telephone: 702/720-3370
Facsimile: 702/720-3371

Electronically Filed On: January 30, 2017

[Proposed] Counsel for Shelley D. Krohn, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

BRANDON MICHAEL D'HAENENS,

Debtor.

Case No. BK-S-16-16602-BTB
Chapter 7

**EX PARTE APPLICATION FOR
EXAMINATION OF SEVERN P.
BIZZARO PURSUANT TO FEDERAL
RULE OF BANKRUPTCY PROCEDURE
2004**

Date of Hearing: N/A
Time of Hearing: N/A

Judge: Honorable Bruce T. Beesley¹

Pursuant to Federal Rules of Bankruptcy Procedure 2004(c) and 9016, which incorporate by reference Rule 45 of the Federal Rules of Civil Procedure and Rule 5075(a)(2)(L) of the Local Rules of Practice for the United States Bankruptcy Court for the District of Nevada, SHELLEY D. KROHN, the Chapter 7 Trustee in the above-captioned bankruptcy proceeding (“Trustee”), by and through her proposed counsel of record, Victoria L. Nelson, Esq. and Jacob L. Houmand, Esq. of the law firm of Nelson & Houmand, P.C., applies for an order directing Severn P. Bizzaro (“Bizzaro”) to appear for examination regarding any and all transactions concerning the acts,

¹ Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The Federal Rules of Civil Procedure will be referred to as “FRCP” and the Federal Rules of Bankruptcy Procedure will be referred to as “FRBP.” The Local Rules of Practice for the United States Bankruptcy Court for the District of Nevada shall be referred to as the “Local Rules”.

1 conduct, or property or to the liabilities and financial condition of BRANDON MICHAEL
2 D'HAENENS (the “Debtor”), any other matter which may affect the Debtor’s estate, including,
3 but not limited to, any and all pre-petition transfers of the real property located at 609 Los Feliz
4 Street, Las Vegas, Nevada 89110 [APN 140-35-110-067], and as to any matter permitted by
5 Federal Rule of Bankruptcy Procedure 2004. A copy of the Proposed Order is attached hereto
6 and marked as **Exhibit “1”**.

7 **WHEREFORE**, the Trustee respectfully requests that this Honorable Court direct
8 Bizzaro to appear for said examination on the 15th day of February, 2017, at 9:00 a.m. at the law
9 offices of Nelson & Houmand, P.C., 3900 Paradise Road, Suite U, Las Vegas 89169-0903.

10 Dated this 30th day of January, 2017.

11 **NELSON & HOUMAND, P.C.**

12
13 By: /s/ Jacob L. Houmand
14 Victoria L. Nelson, Esq. (NV Bar No. 5436)
15 Jacob L. Houmand, Esq. (NV Bar No. 12781)
16 3900 Paradise Road, Suite U
17 Las Vegas, Nevada 89169-0903
18 Telephone: 702/720-3370
19 Facsimile: 702/720-3371

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21 *[Proposed] Counsel for Shelley D. Krohn,*
22 *Chapter 7 Trustee*
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CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of January, 2017, I caused to be served a true and correct copy of EX PARTE APPLICATION FOR EXAMINATION OF SEVERN P. BIZZARO PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004 in the following manner:

☒ (ECF System) By electronically filing a copy of the above-referenced document with the Clerk of the Court for the United States Bankruptcy Court for the District of Nevada via the ECF System. The ECF Confirmation Sheet provides that the following parties were served with the above-referenced document:

SHELLEY D KROHN
shelley@trusteekrohn.com, NV27@ecfbis.com, becca@trusteekrohn.com, jan@trusteekrohn.com

MICHAEL F LYNCH on behalf of Creditor ADAM POLAN
Michael@LynchLawPractice.com,
lynchonline@gmail.com, admin@lynchlawpractice.com, christina@lynchlawpractice.com

KYLE JOSEPH ORTIZ on behalf of Trustee SHELLEY D KROHN
kortiz@nelsonhoumand.com,
jhoumand@nelsonhoumand.com, vnelson@nelsonhoumand.com, cgauss@nelsonhoumand.com

U.S. TRUSTEE - LV - 7
USTPRegion17.LV.ECF@usdoj.gov

WHITNEY B. WARNICK on behalf of Creditor GEORGE E. DOTY
wbw@albrightstoddard.com, cgrey@albrightstoddard.com, bclark@albrightstoddard.com

WHITNEY B. WARNICK on behalf of Creditor SEVERN P. BIZZARO
wbw@albrightstoddard.com, cgrey@albrightstoddard.com, bclark@albrightstoddard.com

WHITNEY B. WARNICK on behalf of Interested Party STEVEN P. SIMMONS
wbw@albrightstoddard.com, cgrey@albrightstoddard.com, bclark@albrightstoddard.com

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1 DAVID J. WINTERTON on behalf of Debtor BRANDON MICHAEL D'HAENENS
2 david@davidwinterton.com,
3 christy@davidwinterton.com; tennille@davidwinterton.com; Julie@davidwinterton.com

4 I declare under penalty of perjury of the laws of the United States that the foregoing is true
5 and correct.

6 Dated this 30th day of January, 2017.

7 **NELSON & HOUMAND, P.C.**

8 By: /s/ Jacob L. Houmand

9 Victoria L. Nelson, Esq. (NV Bar No. 5436)
10 Jacob L. Houmand, Esq. (NV Bar No. 12781)
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15 *[Proposed] Counsel for Shelley D. Krohn,*
16 *Chapter 7 Trustee*

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